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7 *Attorneys for First 100, LLC and Jay Bloom*

8  
9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 THE BANK OF NEW YORK MELLON FKA  
12 THE BANK OF NEW YORK, AS TRUSTEE  
13 FOR THE CERTIFICATEHOLDERS OF  
14 CWALT, INC., ALTERNATIVE LOAN TRUST  
2005-56, MORTGAGE PASSTHROUGH  
CERTIFICATES, SERIES 2005-56

15 Plaintiff,

16 vs.

17  
18 CHRISTOPHER COMMUNITIES AT  
SOUTHERN HIGHLANDS GOLF CLUB  
19 HOMEOWNERS ASSOCIATION; KUPPERLIN  
LAW GROUP, LLC; FIRST 100, LLC; ALAN  
20 LAHRS AND THERESA LARHS AS  
TRUSTEES OF THE LAHRS FAMILY TRUST;  
21 DOE INDIVIDUALS 1-X, inclusive; and ROE  
22 CORPORATIONS I-X, inclusive,

23 Defendants.

24 CHRISTOPHER COMMUNITIES AT  
25 SOUTHERN HIGHLANDS GOLF CLUB  
HOMEOWNERS ASSOCIATION,

26 Cross-Claimant,

27 vs.  
28

Case No.: 2:17-cv-01033-JCM-GWF

**STIPULATION AND REQUEST TO  
EXTEND TIME FOR FIRST 100, LLC  
AND JAY BLOOM TO FILE A RESPONSE  
TO ALAN LAHRS AND THERESA  
LAHRS, AS TRUSTEES OF THE LAHRS  
FAMILY TRUST'S CROSS-CLAIM  
AGAINST FIRST 100, LLC AND THIRD-  
PARTY COMPLAINT AGAINST JAY  
BLOOM (ECF No. 75)**

**(Third Request)**

1 KUPPERLIN LAW GROUP, LLC,

2 Cross-defendant

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6 KUPPERLIN LAW GROUP, LLC

7 Counter-Claimant

8 vs.

9 NATALIE L. WINSLOW, an individual,

10 Counter-defendant.

11 ALAN LAHRS AND THERESA LAHRS AS  
12 TRUSTEES OF THE LAHRS FAMILY  
13 TRUST, a trust established under the laws of the  
State of Nevada,

14 Cross-Claimant

15 vs.

16 CHRISTOPHER COMMUNITIES AT  
17 SOUTHERN HIGHLANDS GOLF CLUB  
18 HOMEOWNERS ASSOCIATION, A  
HOMEOWNER'S ASSOCIATION  
GOVERNED BY THE LAWS OF THE STATE  
OF NEVADA; KUPPERLIN LAW GROUP,  
19 LLC, a Nevada limited liability company;  
20 FIRST 100, LLC, a Nevada limited liability  
company,

21 Cross-Defendants.  
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1 ALAN LAHRS AND THERESA LAHRS AS  
2 TRUSTEES OF THE LAHRS FAMILY  
3 TRUST, a trust established under the laws of the  
State of Nevada,

4 Third-Party Plaintiff,

5 vs.

6 JAY BLOOM, an individual, DOE  
7 INDIVIDUALS I-X inclusive; and ROE  
CORPORATIONS I-X, inclusive,

8 Third-Party Defendants.  
9

10 Cross-Defendant FIRST 100, LLC (“First 100”) and Third-Party Defendant JAY BLOOM  
11 (“Bloom”), by and through their attorneys, the law firm of MAIER GUTIERREZ & ASSOCIATES, and  
12 Alan Lahrs and Theresa Lahrs as Trustees of the Lahrs Family Trust (“Lahrs Parties”), by and through  
13 their attorneys, HUTCHISON & STEFFEN, PLLC and JEFFREY R. ALBREGTS, LLC, hereby STIPULATE  
14 AND AGREE that First 100 and Bloom’s deadline to file a response to Alan Lahrs and Theresa Lahrs  
15 as Trustees of the Lahrs Family Trust’s Answer to Complaint, Cross Claims, and Third-Party  
16 Complaint (ECF No. 75) should be extended from February 4, 2019 to and including **Monday,**  
17 **March 1, 2019.**

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1 This extension is requested as a result of the procedural posture of this case and the mutual  
2 desire of the parties to resolve the claims against First 100 and Bloom prior to First 100 and Bloom  
3 responding to the Lahrs Parties' Complaint. In an effort to continue the productiveness of the  
4 conversations between the parties, First 100 and Bloom and the Lahrs Parties are respectfully  
5 requesting a brief 28-day extension to provide their response. This brief extension will not unduly  
6 delay this matter in any way.

7 DATED this 1st day of February, 2019.

DATED this 1st day of February, 2019.

8 **MAIER GUTIERREZ & ASSOCIATES**

**HUTCHISON & STEFFEN, PLLC**

9  
10 /s/ Danielle J. Barraza

/s/ Todd W. Prall

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*Attorneys for Defendants Alan Lahrs and*  
*Theresa Lahrs as Trustees of the Lahrs*  
*Family Trust*

16 DATED this 1st day of February, 2019.

17 **JEFFREY R. ALBREGTS, LLC**

18 /s/ Jeffrey R. Albregts

19 JEFFREY R. ALBREGTS, ESQ.  
20 Nevada Bar No. 66  
21 701 Shadow Lane, Suite 150  
22 Las Vegas, Nevada 89106  
*Attorneys for Third-Party Complainants*  
*Alan Lahrs and Theresa Lahrs as Trustees*  
*of the Lahrs Family Trust*

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24 IT IS SO ORDERED.

25 DATED February 4, 2019.

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28 UNITED STATES MAGISTRATE JUDGE